

UNITED STATES DISTRICT COURT

for the  
District of New Jersey

United States of America

v.

Keith Ney

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)  
)  
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)  
)

Case No. 10-5635 (KMW)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/20/2010 in the county of Atlantic in the  
District of New Jersey, the defendant(s) violated:

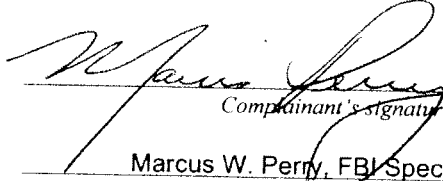
Code Section  
SEE ATTACHMENT A

Offense Description  
SEE ATTACHMENT A

This criminal complaint is based on these facts:

SEE ATTACHMENT B

☒ Continued on the attached sheet.

  
Complainant's signature  
Marcus W. Perry, FBI Special Agent  
Printed name and title

Sworn to before me and signed in my presence.


Date: 12/30/2010

  
Judge's signature

City and state: Camden, New Jersey

Karen M. Williams, U.S. Magistrate Judge  
Printed name and title

CONTENTS APPROVED  
UNITED STATES ATTORNEY

By:   
MATTHEW J. SKAHILL, AUSA

Date: 12/30/10

**ATTACHMENT A**

On or about October 20, 2010, at Atlantic City, in the District of New Jersey, and elsewhere, the defendant,

KEITH NEY,

knowingly and wilfully, by force and violence, and by intimidation, did take and attempt to take from the person and presence of an employee of Cape Bank, Atlantic City, New Jersey, approximately \$2,000.00 belonging to, and in the care, custody, control, management, and possession of Cape Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

**ATTACHMENT B**

1. I, Marcus W. Perry, am a Special Agent for the Federal Bureau of Investigation. I have personally participated in this investigation and am aware of the facts contained herein based upon my own investigation as well as information provided to me by other law enforcement officers. Since this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not necessarily included each and every fact known by the Government concerning this investigation.

2. On October 20, 2010, at approximately 9:04 a.m., the Cape Bank, 1501 Pacific Avenue, Atlantic City, New Jersey was robbed by an individual, later identified as the defendant KEITH NEY. The robber entered the bank, approached the victim teller and produced a robbery demand note that read, "I got a bomb give all the money so I set it off." The teller complied and furnished approximately \$2,000 in United States currency, which the robber carried away from the bank. The robber fled the bank on foot and no getaway vehicle was associated with the robbery. The demand note was recovered by law enforcement officers and retained as evidence. The robber, who was not wearing a mask or any disguise, was captured on the bank's video surveillance system.

3. Subsequent to the robbery, a description of the robber was broadcast over the Atlantic City Police Department's radio. Based on the physical body and clothing description of the suspect, at approximately 9:15 a.m., an officer with the Atlantic City Police Department detained KEITH NEY, who was observed entering a taxi cab in the area of the Atlantic City Trump Plaza Hotel. Contemporaneous with the investigative detention, a detective and another uniformed officer from the Atlantic City Police Department arrived to back-up the officer who performed the vehicle stop. Upon arriving on scene, the detective looked in the rear of the taxi cab with the

door ajar and observed a black sweat jacket lying across the rear seat. The detective then lifted the jacket and observed a large amount of U.S. Currency. The detective then asked NEY if he had robbed the bank and NEY replied, "Yes." NEY was taken into custody and placed into a patrol car. Shortly thereafter, NEY was positively identified by the bank tellers as the bank robber.

4. On October 20, 2010, following his arrest by the Atlantic City Police Department, NEY agreed to waive his Miranda rights and provide a taped statement to the investigators. NEY confessed that he robbed the Cape Bank, in Atlantic City, New Jersey. NEY further admitted that he robbed a bank in Philadelphia, determined to be the Citizens Bank, 1234 Market Street, on or about October 15, 2010.

5. At all relevant times, the deposits of the Cape Bank were insured by the Federal Deposit Insurance Corporation.